

ENSR

2 Technology Park Drive, Westford, Massachusetts, 01886-3140
T 978.589.3000 F 978.589.3100 www.ensr.aecom.com

Memorandum

Date: August 24, 2007

To: Tim Drexler, USEPA
Kevin Herron, IDEM

From: A. Elizabeth Perry, P.G.

Subject: Information about Origins of CCBs
Pines Area of Investigation

Distribution: L. Bradley, ENSR 01776-020

As part of documenting the visual inspection procedures for suspected coal combustion by-products (CCBs), a field meeting was conducted on August 20, 2007. At that meeting, we discussed the following historical information and its bearing on the visual inspection process.

- NIPSCO's Michigan City Generating Station burned coal from the Powder River Basin (PRB) beginning in about 1992 (Site Management Strategy, ENSR 2005). The burning of PRB coal produces a tan-colored ash (K. Strnatka, NIPSCO). Prior to the switch to PRB coal, CCBs from the Michigan City facility would have been black or gray in color, associated with high sulfur Illinois Basin coals. This is confirmed by personnel from Brown Inc, who recall receiving and handling only dark-colored CCBs in the 1970s and 1980s. The Type II (North) Area of Yard 520 was operational up to 1987. Therefore, tan-colored CCBs are present only in the Type III (South) Area of Yard 520 (along with older dark-colored CCBs).
- The available documentation relating to the use of CCBs as fill and/or road bed in the Town of Pines indicates that these activities took place in the early to mid-1970s (see SMS, Appendix F, e.g., Town of Pines municipal minutes, correspondence from Calumet Trucking, etc.).

Based on this information, none of the tan-colored CCBs from the Michigan City plant, which were generated in the 1990s, would have been used as fill or road bed in the 1970s. Therefore, it is not likely that tan-colored CCB will be encountered during the visual inspection process. However, if any material matching this description (tan colored, silt and/or clay sized particles) is encountered, it will be closely examined using other field diagnostic tests (examination under a hand lens, plasticity, reaction to HCl, etc.).

As discussed at the meeting, the visual inspections will be re-started on private properties on September 4, 2007.

References

ENSR. January 2005. Site Management Strategy, Pines Area of Investigation.